



May 10, 2021

Via ECF

Honorable Sidney H. Stein
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

MEMO ENDORSED

United States v. Evelin Jimenez, 18 Cr. 879 (SHS)
Request for Adjournment of Sentencing Hearing

Honorable Judge Stein:

I write on behalf of Ms. Jimenez and with the consent of the Government to respectfully request an adjournment of Ms. Jimenez's sentencing hearing, currently scheduled for June 29, 2021 at 2:30 pm, to a date in September 2021, or any date thereafter that is convenient to the Court. This adjournment is necessary in order for the defense to continue its sentencing investigation and to collect sentencing documents for Ms. Jimenez's sentencing hearing. Also, since we request an in-person, in-court sentencing hearing in the presence of Your Honor, it is important to wait until the current global health pandemic has subsided in order to be able to assure safe accommodations for all, the Court and its staff, the government, the undersigned, and Ms. Jimenez and her family members (some of whom reside in the Dominican Republic and would have to travel), and who wish to be present at her sentencing hearing.¹ Ms. Jimenez remains at liberty on bond since her arrest over two and one half years ago and has not only been "fully compliant" with all of her bond conditions (PSR ¶ 13) but continues in her full-time work at a day-care center where she has been employed since 2016 (PSR ¶ 149) and is doing very well. Thus she will not be negatively impacted by an adjournment of her sentencing hearing.

The government consents to our request for the adjournment. We request a date in September 2021, or any date thereafter that is convenient to this Court.

Respectfully,
s/ Judith Vargas
Judith Vargas, Esq.

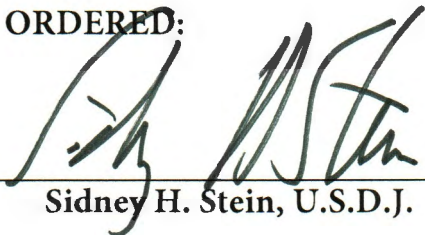
¹ The pandemic has prevented the defense from conducting any in-person meetings with Ms. Jimenez and her family in preparation for her sentencing hearing.

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The sentencing is adjourned to September 28, 2021, at 11:00 a.m. The defense sentencing submissions are due by September 14, 2021, the government submissions are due by September 21, 2021.

**Dated: New York, New York
May 10, 2021**

SO ORDERED:



A handwritten signature in dark ink, appearing to read 'SHS', is written over a horizontal line.

Sidney H. Stein, U.S.D.J.